

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

(A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

(B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;

(C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

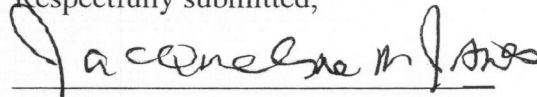
(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

By:



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File Hashes for IP Address 100.2.142.121

ISP: Verizon FiOS

Physical Location: New York, NY

Hit Date UTC	File Hash	Title
09/30/2014 21:15:42	DD4B1B31D7B83F9F4A438166D7B8E5DDC30683F4	Fucking Goddesses
09/30/2014 20:52:58	0654180ACB175B2709D6C9C85054C3343C12ABE3	Nice And Slow
09/25/2014 22:16:10	5DDEBBBBF069FD71FE3398C69E55005F5080DA9C	Sparks
09/25/2014 13:11:18	D6D446D5F1C44131E41BD572F94355C413780FF4	Elevated Erotica
09/23/2014 22:55:53	2C396EC0DC6AA83993269A640A766BE2ED0BC62E	Fascination With My Body
09/23/2014 22:34:51	1D7EBB28EBBAA7246C24D1D1A41AB305296DA7CB	Coming Late
09/23/2014 22:27:53	0B17C5D78E3337FFFBE9F527F6339CEE0C5449CA	Lovers Way
09/23/2014 22:23:39	53C0560968AB817E6EA16C77416664648A99CB2A	Sexy En Noir
09/23/2014 22:13:27	BA520353294B63286016D681522CA0713F431B27	Lisas Hidden Cam
09/23/2014 22:13:12	86885B124BB86A5B3479A9778E00F422D9AB4303	Shes A Spinner
08/13/2014 20:57:50	4A3876525AACCF6C44E3F633BC9C81E467268C2F	Be With Me
06/03/2014 23:03:36	91D22A6F66495928D68FE6EFE63FC676FD6AC763	Hot Orgasm
06/03/2014 22:25:19	0E4E93681E936F6511F653B7EAE0DD9E2CDCF037	Photo Finish
05/30/2014 20:00:00	98A06957366218C460D13E4DC613D7FF5B3FA91F	Blindfold Me and Tie Me Up
05/29/2014 21:04:43	AD6C1AD8FCBA53716EA0396B4FB289EDAC788DF6	From Three to Four
05/29/2014 20:53:36	217D6732A6FFED0D4BBEE863D77C5F18E8291COA	Just Watch
05/29/2014 20:47:50	5FD72C74287630FC37D0C486517696DD1548598B	In My Living Room
05/29/2014 20:07:12	52547B96DD0BDFB178E1718D81B159D10A5800C1	Two By Two
05/29/2014 20:01:39	AE64E35AE7E75AE973222BA3BFE1C4F7388FD915	Perfect Timing
05/29/2014 19:30:05	E78047F304EA7B1BE0A090AD6319FDC6288B3800	Just Watch Part 2
05/29/2014 19:14:05	D7967F3B32132CF925D535059A208B2FA4DEB59F	Group Sex
05/17/2014 23:58:33	B01A41247F2C0FCCE93B78FCAE020DA09AD38005	It Is A Fine Line

EXHIBIT A

SNY4